The Honorable Richard A. Jones

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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10 ABDIQAFAR WAGAFE, *et al., on behalf of
    himself and others similarly situated*,

11   Plaintiffs,

12   v.

13 DONALD TRUMP, President of the United
    States, *et al.*,

14

15   Defendants.

CASE NO. 2:17-cv-00094-RAJ

**DEFENDANTS' STATUS REPORT
REGARDING MOTION TO AMEND
PROTECTIVE ORDER (DKT. #309)**

16

17   We regret that Plaintiffs decided to file a one-sided report on the status of these negotiations,

18 and we are disappointed to see Plaintiffs' slanted and incomplete telling of events. We have

19 bargained in good faith over this matter throughout, and we have worked tirelessly to consult with

20 multiple federal agencies whose equities may be affected by this motion. We did not, as plaintiffs

21 have alleged, "move the goal posts" after reaching an agreement in principle this week. To the

22 contrary, in the spirit of compromise, we conceded to everything Plaintiffs requested in their original

23 motion with only slight modifications that would limit (but not eliminate) potential risks to national

24 security and law enforcement investigations. As of a few hours ago, the only point of disagreement

25 remaining between the parties concerned a relatively mechanical scheduling provision, which was

26 intended to guarantee that we are given a complete list of plaintiffs' potential witnesses before we

27 are required to select potential witnesses for deposition. We are disappointed that Plaintiffs did not

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DEFENDANTS' STATUS REPORT
REGARDING MOTION TO AMEND
PROTECTIVE ORDER (DKT. #309) - 1
(Case No. 2:17-cv-00094-RAJ)

1 agree to this term or propose a workable alternative. Instead, Plaintiffs unexpectedly and

2 inexplicably bailed out of the negotiation and filed their status report. Nevertheless, Defendants

3 stand ready to meet with the Court, as well as continue negotiations to reach an agreement short of a

4 hearing – something we were also prepared to do up until the filing deadline tonight.

DEFENDANTS' STATUS REPORT
REGARDING MOTION TO AMEND
PROTECTIVE ORDER (DKT. #309) - 2
(Case No. 2:17-cv-00094-RAJ)

1   DATED: June 12, 2020   Respectfully submitted,

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17   Office of Immigration Litigation

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     DEFENDANTS' STATUS REPORT
     REGARDING MOTION TO AMEND
     PROTECTIVE ORDER (DKT. #309) - 3
     (Case No. 2:17-cv-00094-RAJ)

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2020, I filed this document via the CM/ECF system, which

will automatically send notice of such filing to all counsel of record.

/s Andrew Brinkman
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STIPULATION FOR ORDER RESOLVING PLAINTIFFS'
MOTION FOR COURT PERMISSION TO INTERVIEW
LIMITED NUMBER OF PERSONS; ORDER THEREON
(Case No. 2:17-cv-00094-RAJ)